



Chapter 3 Permitting Standards

EPA has established customer service standards for its own permitting work that can serve as a guide to other permitting organizations. This chapter deals with permitting standards -- why it is important to have them and measure them, and how permit service providers can fulfill them.

What Are Customer Service Standards?

EPA's customer service standards establish a yardstick by which the Agency will measure itself. EPA has grouped these standards into 9 groups: Universal; Public Access; Partnership; State/Tribal/Local Program Grants; Pesticide Registration; Enforcement Inspections and Compliance Assistance; Rulemaking; Research Grants; and Permitting. EPA created the Customer Service in Permitting workgroup to develop the tools needed to meet the customer service standards for permitting, including ways we can obtain feedback from our permitting customers. Much of our work is summarized in this toolkit.

What are EPA's Permitting Customer Service Standards?

We took draft standards developed by the Agency and worked them into this final set of standards:

We will prepare permits that are clear, fair, appropriate, enforceable, and effective.

Our staff will be knowledgeable, responsive, cooperative, and available.

We will work with representatives of permitting authorities to continually improve permitting processes and services.

We will make our permit decisions within the time frames that are established for the type of permit being requested.

We believe these standards, should lead to world-class customer service. However, we encourage other permit-issuing organizations to modify these standards as needed to fit their particular situation and customer expectations.

How Might a Permit Service Provider Fulfill These Standards?

Each of the permit service providers listed in Chapter 2 has a role in meeting the four permitting customer service standards. Table 3.1 illustrates some activities that might fulfill these standards. It is important to ask customers what they want before deciding how your organization will meet the

standards. That will be the focus of *Chapter 4, Feedback & Measurement*.

Table 3.1
Fulfillment of Permitting Customer Service Standards by Service Providers

- *We will prepare permits that are clear, fair, appropriate, enforceable, and effective*

Headquarters

- promulgate permit regulations that are understandable, written in plain English, and workable
- write guidance materials that clarify the intent behind the permitting requirements, and the rationale leading to final regulatory decisions
- make interpretations on a case-by-case basis whenever questions arise
- stress consistency in application to take the guess work out of implementation
- seek feedback from customers on whether Headquarters' services are clear, fair, appropriate and effective

Regions

- write guidance in plain English
- tailor training programs to meet the needs of delegated permitting authorities
- make permit oversight reviews productive and to the point, taking into account circumstances specific to the permit; do not nit-pick
- seek feedback from customers on whether the Region's services are clear, fair, appropriate and effective services

State/Tribal/Local (and Region, if Region is directly implementing a permit program)

- write permits that reflect the unique nature of the permit applicant's situation
- seek input from the permit applicant and other interested and impacted parties
- make permit decisions after carefully weighing all of the input from the permit applicant and the interested and impacted parties
- seek feedback from customers on whether the permitter's services are clear, fair, appropriate and effective

- *Our staff will be knowledgeable, responsive, cooperative, and available.*

Headquarters

- prepare training programs covering all appropriate rules and regulations for regions, states and regulated community
- respond to inquiries from permit writers in a timely fashion and in the appropriate level of detail
- respond to correspondence, hotlines inquiries, etc., in a timely fashion at the appropriate

level of detail

- maintain records on policy memoranda that are used to interpret regulations, thus ensuring that permit writers have consistent information
- seek feedback on whether Headquarters' staff is knowledgeable, responsive, cooperative, and available
- to the extent practicable, maintain key policy memoranda on the Internet to facilitate access by Regions and delegated authorities

Regions

- develop and implement yearly training programs for permit writers
- train staff subject matter experts where necessary
- seek feedback on whether Regional staff are knowledgeable, responsive, cooperative, and available

State/Tribal/Local

- develop yearly training programs for permit writers
- train staff subject matter experts where necessary
- seek feedback on whether their staff are knowledgeable, responsive, cooperative, and available

- *We will work with representatives of permitting authorities to continually improve permitting processes and services.*

Headquarters

- identify and remove barriers to improved service
- involve regional and state permit writers in the drafting of regulations
- use formal and informal mechanisms to identify permiters' needs for guidance, training, interpretations, new regulations, etc.
- seek customer feedback on whether Headquarters' efforts are actually improving permitting processes and services

Regions

- involve regional permit writers in the drafting of regulations
- use formal and informal mechanisms to identify delegated programs' needs for guidance, training, interpretations, new regulations, etc.
- identify and remove barriers to improved service
- seek customer feedback on whether the Region's efforts are actually improving permitting processes and services

State/Tribal/Local

- identify and remove barriers to improved customer service
- participate through appropriate organizations in the development of EPA regulations

- use formal and informal mechanisms to identify the regulated community needs for guidance, training, interpretations, new regulations, etc.
- seek customer feedback on whether efforts are actually improving permitting processes and services

• We will make our permit decisions within the time frames that are established for the type of permit being requested

Headquarters

- strive for timely decisions, regulations, guidance, interpretations, training, etc.
- seek customer feedback on the timeliness of decisions and services

Regions

- notify states or applicants of expected response dates to submittals and meet or beat those timeframes; if you can't meet the timeframe, notify the state or applicant prior to the original due date and set revised date for the Agency response
- seek customer feedback on the timeliness of decisions and services

State/Tribal/Local

- notify applicants of expected response dates to permit applications and meet or beat those timeframes; if you can't meet the timeframe, notify the applicant prior to the original due date and set a revised date for the Agency response
- seek customer feedback on the timeliness of decisions and services